

US EPA RECORDS CENTER REGION 5



465791

Monthly Oversight Report 10
ACS NPL Site
Griffith, Indiana
September 29 - November 2, 2001



BLACK & VEATCH

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Black & Veatch Special Projects Corp.

USEPA/RAC VII
American Chemical Services RAO (057-ROBF-05J7)

BVSPC Project 46526
BVSPC File C.3
November 9, 2001

Mr. Kevin Adler
U.S. Environmental Protection Agency
77 W. Jackson Boulevard (SR-6J)
Chicago, Illinois 60604-3590

Subject: Monthly Oversight Summary Report
No. 10 for October 2001

Dear Mr. Adler:

Enclosed is the Monthly Oversight Summary Report No. 10 for October 2001 for the American Chemical Services Superfund Site in Griffith, Indiana.

If you have any questions, please call (312-683-7856) or email (campbellm@bv.com).

Sincerely,

BLACK & VEATCH Special Projects Corp.

Larry M. Campbell, P.E.
Site Manager

Enclosure

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Monthly Oversight Summary Report No. 10
ACS Superfund Site WA57, 46526.238

Reporting Period: Month of October (September 29 - November 2, 2001)

BVSPC O/S Dates: October 2, 10, 15, 18, 30, and November 2, 2001

Personnel Summary Affiliation	No. of Personnel	Responsibility
Montgomery Watson Harza	6	Respondent's General Contractor
Black & Veatch Special Projects Corp.	1	USEPA Oversight Contractor
Austgen Electrical	2	Electrical Contractor
Ryan Construction	2	GWTP Upgrades Contractor
Midwest Environmental, Inc.	1	Pond Excavation and Drum Disposal Contractor
Ozinga	1	Rolloff Transport Contractor
Onyx Environmental Services	5	Drum Disposal Contractor

Construction Activities

Major Activities:

- Midwest Environmental, Inc. completed the pond and wetland grading.
- Austgen installed permanent power to the OFCA and the motor control center in the OFCA blower shed.
- Ryan Construction installed upgrades in the GWTP.
- Montgomery Watson Harza conducted the annual residential well sampling event.
- Contract Dewatering Services began repairing extraction well EW-20C.
- Montgomery Watson Harza selected Onyx Environmental Services and Midwest Environmental, Inc. for the drum disposal activities.
- Montgomery Watson Harza selected Heritage Industrial Services as the contractor for the ISVE yard piping.
- Montgomery Watson Harza held one construction coordination meeting on October 18, 2001.

Activities Performed:

Midwest Environmental, Inc. (MEI) completed the pond and constructed a swale from the ACS storm

water discharge outflow near the GWTP to the wetland area north of the pond. Montgomery Watson Harza (MWH) directed the GWTP discharge to the discharge structures located in the wetland north of the pond excavation. MWH reported that the pond was draining into the PGCS; therefore, MEI moved the eastern boundary of the pond further west by backfilling and regrading. MWH also reported that approximately 5,800 cubic yards of PCB-impacted soil were removed from the wetland area and stockpiled at the firepond area in the ACS facility. As part of the pond excavation activities, approximately 6,500 cubic yards of soil were removed from the wetlands and were stockpiled in the OFCA for future use as root zone material in the final OFCA cap. Black & Veatch Special Projects Corp. (BVSPC) observed that a cap was missing from the piezometer located immediately north of the pond. MWH replaced the cap on the piezometer 2 weeks later.

Austgen installed permanent power to the OFCA blower shed. The motor control center was also installed in the OFCA blower shed. The electrical work has been completed for NIPSCO to install a metering box on the permanent power pole on Colfax Ave.

Ryan Construction completed upgrades to the GWTP. MWH reported that the new oxidizer has been delayed again and will be delivered in December. MWH continued to pump from the BWES extraction wells EW-11, EW-19, EW-20B, and EW-20C and discharge to the wetlands at a rate of 50 gpm.

The rolloff with the ISVE well drill cuttings was moved by Ozinga from the OFCA to the ONCA drum storage area on October 3, 2001.

BVSPC observed that erosion matting was placed between the stockpiled materials from the wetland excavation and swale 3. The erosion matting was placed throughout the length of the stockpiled materials except for the northernmost 50 feet. BVSPC observed that the root zone material was overtopping the silt fencing on the northeastern portion of the stockpile on the OFCA and eroding into swale 3.

MWH conducted the annual residential well groundwater sampling for the TAL/TCL parameters on October 15, 2001. The residential wells sampled were located at 1002 Reder Rd., 1009 Reder Rd., 1029 Reder Rd., and 1033 Reder Rd. MWH could not sample from the well at 1007 Reder Rd. The house was vacant and the electricity was turned off due to a fire. Samples were sent to CompuChem for analysis.

Contract Dewatering Services (CDS) began excavation activities to repair extraction well EW-20C. CDS removed the topsoil and clay from the cover and segregated these materials for replacement as the cover. The material excavated from underneath the cover was staged off the ground where the cover was removed. CDS installed a well point system immediately outside of the trench box to dewater the excavation. The water was pumped from the excavation directly to the biotank at the GWTP. CDS and MWH routinely inspected the conveyance piping from the excavation to the GWTP. Air monitoring was conducted by CDS and MWH at the perimeter of the excavation with a PID. The PID readings spiked at 30 ppm at the perimeter of the excavation. MWH is considering adding another extraction well in the ONCA to replace the firepond extraction point.

MWH selected Onyx Environmental Services (OES) and MEI for the drum disposal activities. MWH held a kick-off meeting for the drum waste disposal activities on November 2, 2001. OES, MEI, and BVSPC attended the meeting. Overpack drums were scheduled to be removed on November 5, 2001, and will be removed based on the Hazcat analyses. MEI scheduled the shearer to size the drum carcass waste for November 8, 2001. Drum disposal activities are expected to take approximately 2 weeks to complete.

MWH selected Heritage Industrial Services for the installation of the ISVE yard piping.

Attached are BVSPC weekly reports No. 31 through 34, correspondence, log book notes, and photographs of the daily activities. BVSPC's crew conducted oversight of the major field activities on October 2, 10, 15, 18, 30, and November 2, 2001. BVSPC's crew attended one weekly construction meeting on October 18, 2001. MWH did not hold construction meetings on October 4, 11, 25, and November 1, because of the construction inactivity at the site.

Topics of Concern:

- MWH was unable to obtain a groundwater elevation at monitoring well MW-18 due to debris in the well. MW-18 is part of the long term monitoring program.
- Installation of the abandonment casing around ATMW-4D is suspect as to its effectiveness because the outer casing was driven in with the kelly bar and the auger chuck. Driving the casing down does not allow the tremmie pipe to reach the bottom of the annulus space on the outside of the casing for proper grouting.
- The residential well located at 1007 Reder Road could not be sampled because the pump was not operating. This well is part of the long term monitoring program.

Concern Resolution:

- None to report this month.

Upcoming Activities:

- CDS to complete repairing extraction well EW-20C.
- OES and MEI to dispose of overpack drums and drum carcasses.
- Heritage Industrial Services to install ISVE yard piping.

Signatures: Leigh Albrecht

Date: November 6, 2001

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Weekly Oversight Summary Report No. 31
ACS Superfund Site WA57, 46526.238

Reporting Period: Week of October 1, 2001

BVSPC O/S Dates: October 2, 2001 (Ms. Albrecht)

Personnel Summary Affiliation	No. of Personnel	Responsibility
Montgomery Watson Harza	1	Respondent's General Contractor
Black & Veatch Special Projects Corp.	1	USEPA Oversight Contractor
Austgen	2	Electrical Contractor
Ryan Construction	2	Contractor
Midwest Environmental, Inc.	1	Pond Excavation Contractor
Ozinga	1	Rolloff Transport Contractor

Construction Activities

Major Activities:

- Midwest Environmental, Inc. began constructing a swale east of the wetland pond area.
- Austgen began installing the permanent power supply to the OFCA blower shed.
- Ryan Construction began installing upgrades in the GWTP.
- Montgomery Watson Harza canceled the weekly construction coordination meeting because of the construction inactivity at the site.

Activities Performed:

Montgomery Watson Harza (MWH) reported that Midwest Environmental, Inc. (MEI) began constructing the swale from the ACS storm water discharge outflow near the GWTP to the wetland area north of the pond. MWH also reported that the swale will be completed once additional culvert piping is added and MEI is back on-site. The temporary road panels were removed from the wetland area and staged north of the MWH trailer. MWH continued to direct the GWTP discharge to the discharge structures located in the wetlands to the north of the pond excavation.

Austgen began to install the permanent power to the OFCA blower shed. Tom Tinics of MWH reported that NIPSCO will charge the power supply once Austgen completes the connections.

Ryan Construction began installing upgrades in the GWTP. MWH reported that the new oxidizer has been delayed again.

BVSPC observed that a cap was missing from the piezometer located immediately north of the center of the pond. BVSPC brought this to the attention of MWH. MWH stated that they would cap the piezometer that afternoon.

MWH contacted Ozinga to move the rolloff with the drill cuttings from the OFCA to the ONCA drum storage area. The rolloff was scheduled to be relocated on October 3, 2001.

BVSPC observed a significant amount of ponded water on the drum waste rolloff tarps on the ACS facility and damaged caution tape. BVSPC watched Tom Tinics of MWH conduct a daily investigation of the drum waste on the ONCA. Mr. Tinics conducted the inspection without the PID and stated that he would re-inspect the rolloffs and the drums later in the afternoon with the PID. Mr. Tinics did begin removing the water that was ponded on the rolloff tarps.

MWH did not hold a weekly construction coordination meeting because of the construction inactivity at the site.

Topics of Concern:

- MWH was unable to obtain a groundwater elevation at monitoring well MW-18 due to debris in the well. MW-18 is part of the long term monitoring program.
- Installation of the abandonment casing around ATMW-4D is suspect as to its effectiveness because the outer casing was driven in with the kelly bar and the auger chuck. Driving the casing down does not allow the tremmie pipe to reach the bottom of the annulus space on the outside of the casing for proper grouting.

Concern Resolution:

- None to report.

Upcoming Activities:

- MEI to complete the swale from the ACS stormwater discharge to northern portion of the wetlands.
- MWH to award the contract for the ISVE well yard piping installation.
- MWH to negotiate the contract for the drum disposal activities.
- Austgen to complete the installation of the permanent power supply and motor control center for the OFCA blower shed.
- Ryan Construction to complete installing upgrades in GWTP.
- MWH to sample residential wells in mid October.

Signatures: Leigh Albrecht

Date: October 8, 2001

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Weekly Oversight Summary Report No. 32
ACS Superfund Site WA57, 46526.238

Reporting Period: Week of October 8, 2001

BVSPC O/S Dates: October 10, 2001 (Ms. Albrecht)

Personnel Summary Affiliation	No. of Personnel	Responsibility
Montgomery Watson Harza	3	Respondent's General Contractor
Black & Veatch Special Projects Corp.	1	USEPA Oversight Contractor
Austgen	1	Electrical Contractor
Ryan Construction	1	Contractor

Construction Activities

Major Activities:

- Austgen continued to install the permanent power supply and began installing the motor control center in the OFCA blower shed.
- Ryan Construction continued to install upgrades in the GWTP
- Montgomery Watson Harza canceled the weekly construction coordination meeting because of the construction inactivity at the site.

Activities Performed:

Montgomery Watson Harza (MWH) reported that Midwest Environmental, Inc. (MEI) will return to the site to finish grading activities and cutting the swale. BVSPC observed that the majority of the rebar in the concrete pieces was removed from the swale from the drainage structure into the pond. The piezometer located to the north of the pond was still missing a cap.

Austgen continued to work on connecting the power supply to the OFCA and began installing the motor control center in the OFCA blower shed.

Ryan Construction continued to install upgrades in the GWTP.

BVSPC observed that the rolloff containing the drill cuttings from the ISVE well installation had been moved from the OFCA to the rolloff storage area in the ONCA. Caution tape was not placed around the rolloff.

BVSPC observed that erosion matting had been placed between the stockpiled root zone materials from

the pond excavation and swale 3.

MWH did not hold a weekly construction coordination meeting because of the construction inactivity at the site. MWH reported that they were negotiating with Onyx Environmental Services and Heritage for the drum disposal and several contractors for the ISVE yard piping installation. MWH expected that MEI had one day of work left regrading the wetland area near the GWTP. The two samples taken from the hot spot excavation located west of the GWTP were sent to CompuChem for analysis, and the results indicated that the concentrations of PCBs in the soils were less than 1 ppm.

Topics of Concern:

- MWH was unable to obtain a groundwater elevation at monitoring well MW-18 due to debris in the well. MW-18 is part of the long term monitoring program.
- Installation of the abandonment casing around ATMW-4D is suspect as to its effectiveness because the outer casing was driven in with the kelly bar and the auger chuck. Driving the casing down does not allow the tremmie pipe to reach the bottom of the annulus space on the outside of the casing for proper grouting.

Concern Resolution:

- None to report.

Upcoming Activities:

- MEI to complete the swale from the ACS discharge to northern portion of the wetlands.
- Ryan Construction to complete upgrades to the GWTP.
- Austgen to complete the installation of the motor control center in the OFCA blower shed.
- MWH to sample residential wells in mid October.
- MWH to award contract for ISVE well yard piping installation.
- MWH to negotiate contract for drum disposal activities.

Signatures: Leigh Albrecht

Date: October 15, 2001

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Weekly Oversight Summary Report No. 33
ACS Superfund Site WA57, 46526.238

Reporting Period: Week of October 15, 2001

BVSPC O/S Dates: October 15 (Ms. Albrecht) and 18, 2001 (Mr. Campbell)

Personnel Summary Affiliation	No. of Personnel	Responsibility
Montgomery Watson Harza	6	Respondent's General Contractor
Black & Veatch Special Projects Corp.	1	USEPA Oversight Contractor
Austgen	1	Electrical Contractor
Ryan Construction	1	Contractor

Construction Activities

Major Activities:

- Austgen installed the motor control center in the OFCA blower shed.
- Ryan Construction completed upgrades to the GWTP
- Montgomery Watson Harza performed annual residential well sampling activities.
- Montgomery Watson Harza awarded the drum disposal contract to Onyx Environmental Services.
- Montgomery Watson Harza held the weekly construction coordination meeting.

Activities Performed:

Austgen installed the motor control center in the OFCA blower shed. The electrical work has been completed for NIPSCO to install a metering box on the permanent power pole on Colfax Ave.

Montgomery Watson Harza (MWH) continued to pump from the BWES extraction wells EW-11, EW-19, EW-20B, and EW-20C and discharge to the wetlands at a rate of 50 gpm. Ryan Construction completed the upgrades to the GWTP.

MWH conducted the annual residential well groundwater sampling for the TAL/TCL parameters on October 15, 2001. The residential wells sampled were located at 1002 Reder Rd., 1009 Reder Rd., 1029 Reder Rd., and 1033 Reder Rd. MWH could not sample from the well at 1007 Reder Rd. The house was vacant and the electricity was turned off due to a fire. Samples were sent to CompuChem for analysis.

Midwest Environmental, Inc. (MEI) was scheduled to return to the site to complete grading activities during the week of October 22, 2001. MWH reported that the pond is currently draining into the PGCS, and MEI will move the eastern boundary of the pond further west. MWH also reported that approximately

5,800 cubic yards of PCB-impacted soil were removed from the wetland area. As part of the pond excavation activities, approximately 6,500 cubic yards of soil were removed from the wetlands and stockpiled in the OFCA for future use as root zone material. BVSPC observed that a cap was installed on the piezometer located immediately north of the wetland pond.

MWH continued to work with Contract Dewatering Services (CDS) to determine a resolution to the problem at EW-20C. CDS was scheduled to repair extraction well EW-20C on October 29, 2001. MWH is considering adding another extraction well in the ONCA to replace the firepond extraction point.

MWH expects to award the ISVE yard piping installation contract next week. Construction activities are scheduled to begin in 2-3 weeks and are expected to take 3 weeks. The thermal oxidizer for the OFCA ISVE system was scheduled for delivery in December.

MWH reached an agreement with Onyx Environmental Services (OES) for the drum waste disposal activities. OES will remove the overpack drums based on the Hazcat analyses. MWH has contracted with MEI for the processing and sizing of the drum carcass wastes. OES will remove the drum carcass waste within 2 to 3 weeks. MWH scheduled OES to begin drum removal activities on October 29, 2001.

BVSPC observed that a portion of the clay cover washed into swale 3 on the northernmost portion of the OFCA. Erosion matting had not been placed in this area along swale 3.

Topics of Concern:

- MWH was unable to obtain a groundwater elevation at monitoring well MW-18 due to debris in the well. MW-18 is part of the long term monitoring program.
- Installation of the abandonment casing around ATMW-4D is suspect as to its effectiveness because the outer casing was driven in with the kelly bar and the auger chuck. Driving the casing down does not allow the tremmie pipe to reach the bottom of the annulus space on the outside of the casing for proper grouting.
- The residential well located at 1007 Reder Road could not be sampled because the pump was not operating. This well is part of the long term monitoring program.

Concern Resolution:

- None to report.

Upcoming Activities:

- MEI to complete grading activities in the wetland area.
- OES to begin removing drum waste.
- CDS to begin repairing extraction well EW-20C.
- MWH to award contract for ISVE well yard piping installation.

Signatures: Leigh Albrecht

Date: October 25, 2001

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**WEEKLY CONSTRUCTION MEETING AGENDA
FOR OCTOBER 18, 2001 MEETING
AMERICAL CHEMICAL SERVICE, NPL SITE**

MEETING DATE: October 18, 2001

MEETING TIME: 10:00 AM

MEETING LOCATION: ACS Site – Site Trailer

TOPICS:

Health and Safety (Tom)

- Health and Safety Summary

Groundwater Treatment Plant (GWTP) (Lee)

- Status
- Mechanical upgrades

Groundwater Monitoring (Travis)

- September 2001 long-term monitoring round conducted on September 25, 2001
 - Annual Sampling of Residential Wells conducted on October 15, 2001
- ORC Sampling of South Area Pilot Study conducted on September 26, 2001
 - Final ORC Sampling round – November 2001

PCB Soils Excavation (Travis)

- Final results (included in October 2001 Monthly Status Report)
- Survey of final excavation area by Area Survey – October 18, 2001

Off-Site Utilities (Tom)

- NIPSCO metering box installation

Barrier Wall Extraction System (BWES) (Todd)

- Contract Dewatering/EW-20 update

In-Situ Vapor Extraction System (ISVE) (Chris or Todd)

- Thermal oxidizer unit
- Conveyance piping installation
- Start-up

Drum Removal (Todd)

- Status

Next Weekly Construction Meeting

- To be determined

Name	Company	Fax Number
TODD LEWIS	MWH	630 836 8959
TRAVIS KLINGERTH	MWH	"
ROB ADAMS	MWH	"
Larry Campbell	BUSPK	312-346-4771
Peter VAGT	MWH	630 836-8959
TOM TINIES	MWH	
LEE OROSZ	MWH	
KEVIN ADLER	EPA	VIA PHONE

**WEEKLY CONSTRUCTION MEETING MINUTES
FOR OCTOBER 18, 2001 MEETING
AMERICAL CHEMICAL SERVICE, NPL SITE**

MEETING DATE: October 18, 2001

MEETING TIME: 10:00 AM

MEETING LOCATION: ACS Site – Site Trailer

ATTENDEES:

Rob Adams – MWH
Travis Klingforth – MWH
Todd Lewis – MWH
Lee Orosz – MWH
Tom Tinics – MWH
Peter Vagt – MWH
Kevin Adler – U.S.EPA (via phone)
Larry Campbell - BVSPC

TOPICS:

Health and Safety

No health and safety incidents occurred on the site since the last weekly construction meeting held September 27, 2001. No subcontractors are currently working on the site. Therefore, weekly health and safety meetings with the subcontractors are not currently taking place. Additional signs have been placed on the site for parking controls and to prohibit hunting or trespassing.

Groundwater Treatment Plant (GWTP)

GWTP influent continues to come from the Barrier Wall Extraction System (BWES) and Perimeter Groundwater Containment System (PGCS). Extraction wells EW-11, EW-19, EW-20B, and EW-20C are providing influent to the GWTP. EW-12, EW-13, EW-15, EW-16, EW-20, and EW-20A are awaiting the installation of new pumps during the week of October 22, 2001.

The GWTP mechanical system maintenance, performed by Ryan Construction during September 2001, is complete. The GWTP discharges into the wetlands as indicated in the final design.

Groundwater Monitoring

As reported in the October 2001 monthly status report, the September 2001 long-term monitoring round was conducted on September 25, 2001. The Annual Sampling of Residential Wells was conducted on October 15, 2001. Four of the five residential homes that are part of the sampling program were sampled. The home at 1007 Reder Road could not be sampled because the home had been vacated and the pump had been turned off due to a recent fire.

ORC[®] Sampling of South Area Pilot Study was conducted on September 26, 2001, as reported in the October 2001 monthly status report. The final ORC[®] Sampling round will take place in November 2001.

PCB Soils Excavation

The final results of the PCB-impacted soil sampling were included in the October 2001 monthly status report. The final excavation area survey will be conducted by Area Survey on October 18, 2001. Further work in the wetlands is not expected so final documentation of the remedial activities will be provided in the completion report. This item will be removed from the next meeting agenda.

Off-Site Utilities

Everything is ready and in place for NIPSCO to install a metering box on the newly-installed permanent power pole on Colfax Ave. just east of the Off-Site Area.

Barrier Wall Extraction System (BWES)

Contract Dewatering Services (CDS) is scheduled to be on site beginning October 29, 2001 to complete the installation of extraction well EW-20C. Also, an additional extraction point will be placed in the On-Site Area by MWH in the near future. This extraction well will serve as a backup pumping source to control the water level since the firepond was closed.

In-Situ Vapor Extraction System (ISVE)

The motor control center (MCC) has been installed by Austgen Electric in the blower shed. Submittals from the manufacturer of the thermal oxidizer unit have been received. The final instrumental and control components are being finalized. The unit is expected to arrive during December 2001.

Bids have been received for the installation of the ISVE conveyance piping, and the contract is expected to be awarded during the week of October 22, 2001. Construction may begin in 2-3 weeks. The installation is expected to take 3 weeks.

Start-up of the ISVE system is anticipated for January 2001.

Drum Removal

Onyx and MWH have reached a contract agreement for the disposal of the material excavated during the Drum Removal earlier this year. The final contracts have been produced and are in circulation for signatures. The final contract is expected to be signed on October 22, 2001. Onyx will come to the site during the week of October 22, 2001 for disposal characterization. WTI/Heritage and MWH could not come to contract agreement on disposal, therefore WTI/Heritage is not currently being considered as an option.

Kevin Adler of the U.S. EPA confirms that both Onyx and WTI/Heritage are in compliance. Todd will be summarizing the actions to occur in a memo during the week of October 22, 2001.

After the overpacked drums are removed from the site for disposal by Onyx, Midwest Environmental, Inc. (MEI) will empty each roll-off box of drum debris onto the drum pad for resizing to the dimensions necessary for processing at the Onyx facility. The resized debris will then be placed into Onyx containers for transportation and disposal. An Onyx representative will be on site to supervise and approve the resizing process.

Sampling of the waste will be done as required by the disposal facility. This sampling may be less than the sampling detailed in the drum removal work plan dated January 1999.

Next Weekly Construction Meeting

- November 1, 2001

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Weekly Oversight Summary Report No. 34
ACS Superfund Site WA57, 46526.238

Reporting Period: Week of October 22, 2001

BVSPC O/S Dates: Canceled due to limited site activities.

Personnel Summary Affiliation	No. of Personnel	Responsibility
Montgomery Watson Harza	1	Respondent's General Contractor
Black & Veatch Special Projects Corp.	0	USEPA Oversight Contractor

Construction Activities

Major Activities:

- Montgomery Watson Harza awarded the ISVE yard piping contract to Heritage Industrial Services.
- Montgomery Watson Harza canceled the weekly construction coordination meeting because of the construction inactivity at the site.

Activities Performed:

Todd Lewis of Montgomery Watson Harza (MWH) reported that the contract for the waste removal was awarded to Onyx Environmental Services (OES). Depending on when the waste analysis records are completed, the overpack drums may be removed at the end of the week of October 29, 2001.

MWH also reported that the ISVE yard piping contract was awarded to Heritage Industrial Services and that the submittals for the work are expected in the upcoming weeks.

MWH did not hold the weekly construction coordination meeting because of the construction inactivity at the site.

Topics of Concern:

- MWH was unable to obtain a groundwater elevation at monitoring well MW-18 due to debris in the well. MW-18 is part of the long term monitoring program.
- Installation of the abandonment casing around ATMW-4D is suspect as to its effectiveness because the outer casing was driven in with the kelly bar and the auger chuck. Driving the casing down does not allow the tremmie pipe to reach the bottom of the annulus space on the outside of the casing for proper grouting.
- The residential well located at 1007 Reder Road could not be sampled because the pump was not operating. This well is part of the long term monitoring program.

Concern Resolution:

- None to report.

Upcoming Activities:

- Midwest Environmental, Inc. to complete grading activities in the wetland area.
- OES to begin removing drum waste.
- Contract Dewatering Services to begin repairing extraction well EW-20C.
- Heritage Industrial Services to install ISVE well yard piping.

Signatures: Leigh Albrecht

Date: October 25, 2001

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Weekly Oversight Summary Report No. 35
ACS Superfund Site WA57, 46526.238

Reporting Period: Week of October 29, 2001

BVSPC O/S Dates: October 30, 2001 and November 2, 2001 (Ms. Albrecht)

Personnel Summary Affiliation	No. of Personnel	Responsibility
Montgomery Watson Harza	4	Respondent's General Contractor
Black & Veatch Special Projects Corp.	1	USEPA Oversight Contractor
Contract Dewatering Services	3	Extraction Well Repair Contractor
Onyx Environmental Services	5	Drum Disposal Contractor
Midwest Environmental Services, Inc.	1	Drum Disposal Contractor

Construction Activities

Major Activities:

- Contract Dewatering Services began excavation activities to repair extraction well EW-20C.
- Midwest Environmental, Inc. completed grading the wetland pond area.
- Montgomery Watson Harza held a kick-off meeting for the drum disposal activities on November 2, 2001.
- Montgomery Watson Harza canceled the weekly construction coordination meeting because of the construction inactivity at the site.

Activities Performed:

Contract Dewatering Services (CDS) began excavation activities to repair extraction well EW-20C. CDS removed the topsoil and clay from the cover and segregated these materials for future replacement. The material excavated from underneath the cover was staged on the ground where the cover was removed. CDS installed a well point system immediately outside of the trench box to dewater the excavation. The water was pumped from the excavation directly to the biotank at the GWTP. CDS and Montgomery Watson Harza (MWH) routinely inspected the conveyance piping from the excavation to the GWTP. Air monitoring was conducted by CDS and MWH at the perimeter of the excavation with a PID. The PID readings spiked at 30 ppm at the perimeter of the excavation.

Midwest Environmental, Inc. (MEI) completed its regrading activities in the wetland pond area.

MWH held a kick-off meeting for the drum waste disposal activities on November 2, 2001. Onyx Environmental Services (OES), MEI, and BVSPC attended the meeting. Overpack drums were scheduled to be removed on November 5, 2001. MEI scheduled the shearer to size the drum carcass waste for November 8, 2001. Drum disposal activities are expected to take approximately 2 weeks to complete.

BVSPC observed that the root zone material was overtopping the silt fencing on the OFCA. No additional erosion matting was observed along swale 3.

MWH did not hold the weekly construction coordination meeting because of the construction inactivity at the site.

Topics of Concern:

- MWH was unable to obtain a groundwater elevation at monitoring well MW-18 due to debris in the well. MW-18 is part of the long term monitoring program.
- Installation of the abandonment casing around ATMW-4D is suspect as to its effectiveness because the outer casing was driven in with the kelly bar and the auger chuck. Driving the casing down does not allow the tremmie pipe to reach the bottom of the annulus space on the outside of the casing for proper grouting.
- The residential well located at 1007 Reder Road could not be sampled because the pump was not operating. This well is part of the long term monitoring program.

Concern Resolution:

- None to report.

Upcoming Activities:

- CDS to complete repairing extraction well EW-20C.
- OES and MEI to begin removing drum waste.
- Heritage Industrial Services to install ISVE well yard piping.

Signatures: Leigh Albrecht

Date: October 25, 2001

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**EXCAVATED DRUM WASTE DISPOSAL KICK-OFF MEETING AGENDA
NOVEMBER 2, 2001
AMERICAN CHEMICAL SERVICE, NPL SITE**

MEETING DATE: November 2, 2001

MEETING TIME: 9:00 AM

MEETING LOCATION: ACS Site – Site Trailer

ATTENDEES:

Schedule and Logistics

- Hours of operation
- Projected schedule

Health and Safety

- Health and Safety Procedures and Monitoring
 - Personal Protective Equipment (PPE)
 - Air Monitoring

Drum Waste Disposal Procedures

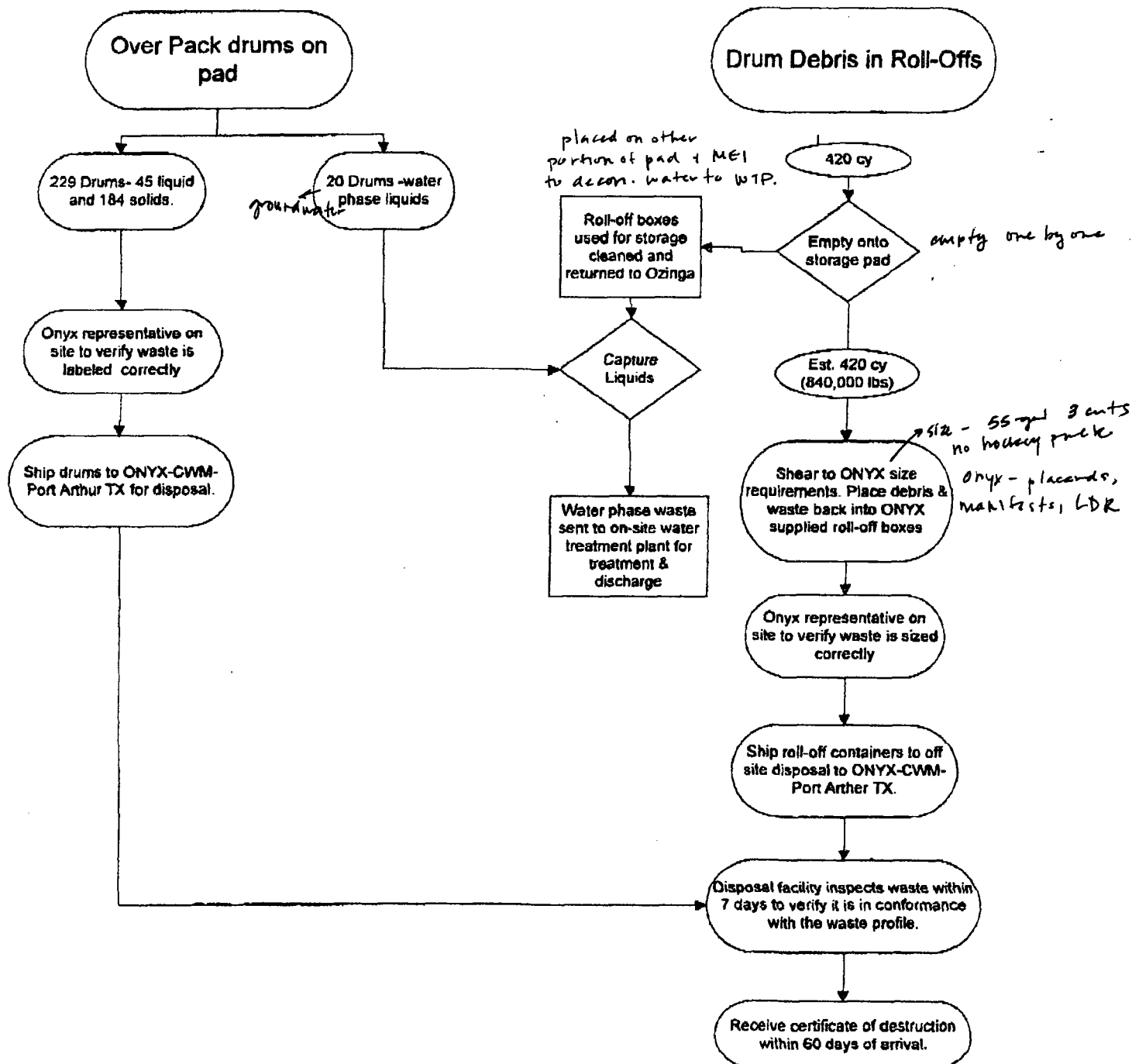
- Drum waste labeling/manifesting
- Drum waste movements
- Roll-off box handling
 - Emptying Ozinga roll-off boxes
 - Cleaning Ozinga boxes
 - Filling Onyx boxes
 - Staging Ozinga and Onyz boxes
 - Truck routes, weighing, placards
- Drum pad water management
- Drum pad cleaning

SIGN IN SHEET
EXCAVATED DRUM WASTE DISPOSAL KICK-OFF MEETING
NOVEMBER 2, 2001

Name	Company	Fax Number
Laigh Albrecht	BVSPC	312 - 346 - 4781
Douglas R DRAIA	ACS	219 924 4370
TRAVIS KLINGFORTH	MWH	630.836.8959
TODD LEWIS	MWH	" " "
Ken Field	MEF	219.933-4750
Bill Dwyer	OES	Ph# 219-392-6700 FAX# 219-391-0232
DAN PREBOY	OES	FAX# 219 391 - 0232
JASON COBURN	OES	FAX# 219 391 - 0232
Peter VAGT	MWH	630 836 - 8959
JOHN FLAMINIO	O.E.S.	FAX# 219-391-0232
PAT O'Shea	OES	Ph# 219-392-6714 FAX# 219-391-0232

ACS
Drum Waste Disposal

October 30, 2001



(108)

10/2/01

T. J. T. T. T.

0720 Arrive on site, clear, 60 °F, light S breeze

Personnel Present:

Tom Tinics MWH

Gary Alexander Austgen

Brian Laubker Austgen

Mark Housley Ryan Const

Tom Evers Ryan Const

Lough Albrect BVSPC

0730 Walked wetland area. Observed a swale cut from ACS discharge to wetlands north of ponds approx 30 feet from GWTP west fence line. Continued discharge from drainage structure 1 into pond. Temporary road panels have been removed and rinsed. Staged north of trailer.

0800 Spoke with T. Tinics, He reported M&E to be out to finish grading and swales. need move culvert piping. Austgen hooking up power on OFCA. T. Tinics reported that oxidizer delayed, MWH may need to find new supplier. Ryan Construction removing insulation on piping outside of GWTP. Pointed out piezometer on north end of pond that was not capped. T. Tinics to get a cap.

T. J. T. T. T.

(109)

10/2/01

T. J. T. T. T.

0840 Walked OFCA, grass in non-engineered areas oxygen tanks and roll off with drill cuttings still on OFCA. Ponding water in Swale 4 still present.

0855 Roll 15 Photo 3 facing west Photo of SVE-36 collar repair installed by B.A.

0910 Walked drum storage area. Some caution tape is down, tarps on a few rolloffs depressed with water. Will speak with T. Tinics.

0940 T. Tinics inspected rolloffs - visual only. stated that he would bring the PID with him later. Did remove water from tarps. T. Tinics also called OZINGA to get rolloff moved from OFCA. to be moved Wednesday

1000 left site for day

~~T. J. T. T. T.~~
~~10/2/01~~

(110)

10/10/01

T. J. ELLIOTT

0845 Arrive on-site, Cloudy, rainy, App. 60°F
Wind from South

Personnel present Onsite

Lee Orosz MWH

Tom Evans Ryan Construction

Todd Lewis MWH

Tom Tinies MWH

Rich Flores Austgen

Leigh Albright BNSF

0855 Walked wetland area. Observed cap still missing from piezometer north of pond area. Swale cut from ACS discharge to area north of pond. No discharge observed from GWSP to discharge structure 1. Rebar predominantly cut from concrete in swale from drainage structure to pond.

0915 Roll 15 Photo 4 Facing southeast at northern portion of stormwater swale from ACS facility to wetland

0920 Roll 15 Photo 5 Facing west from ACS stormwater discharge point showing swale around pond to wetland

0925 Walked drum storage area. Observed that roll off with drill cuttings from ISUE well installation has been moved to storage

T. J. ELLIOTT

(111)

10/10/01

T. J. ELLIOTT

area. No caution tape observed around roll off area. Roll 15 Photo 6 Facing east of roll off with drill cuttings. No caution taping and significant amount of water weighing down traps.

0940 Spoke with T. Lewis (MWH) regarding upcoming activities. He reported that MEI has one day of work filling/grading area w/ GWTP excavated for PCBs previously. Compchem results < 1 ppm PCBs for area. Negotiating with ISUE contractors. Expect next couple of weeks to award, then 2 weeks until mobilizing. Now MWH speaking with Onyx and Heritage from drum disposal. MWH reported that they hope to have negotiating contract complete in next couple of weeks. Austgen onsite working on MCC and control logic being determined by MWH for blowershed. Ryan construction working on GWTP and piping upgrades - clean out parts in pipes. No construction mty this week.

0945 Observed that erosion matting has been placed on OFCA between swale 3 and silt fencing - bordering roof zone material from pond excavation - near Colfax Ave.

0955 Leave site and return to office

T. J. ELLIOTT

(112)

10/15/01

T. E. Albert

0735 Arrive Onsite. Clear, 50 °F

0740 Personnel Present

Lee Orosz

MWH

Tom Evics

Ryan Construction

Lyle Albrecht

BVSPC

0755 Walked pond area. Observed a cap on piezometer. Area near GWTP has not been regraded to final grade.

water in swale cut from ACS storm water discharge to northern wetland area.

0820 Walked portion of the perimeter of OFCA. Observed ponding water in Swale 4 between EW20C and EW20B. Observed some ponding water in trucks in corner at intersection of swales 4 and 2. Observed portion of clay cover washed into Swale 3 on northern portion between wetland soil stockpiles and swale. Erosion matting not present in northernmost 50-75 feet between swale and stockpiled soils.

0930 Spoke with T. Timis of MWH regarding upcoming activities. He reported CDS submitted work plan. MWH to submit conditions of work. Expect CDS end of October.

T. E. Albert

(113)

T. E. Albert 10/15/01

MWH still negotiating drum disposal contract, and yard piping. Expect to discuss upcoming activities.

1020 MWH arrived at 1002 Reder Road for residential well sampling. Sampling for full TCE/THAL analyte list. Also took MS/MSD at 1002 Reder Road. Samples to Comp Chem.

1055 MWH concluded sampling at 1002 Reder Rd.

1105 Observed sampling 1007 Reder Rd. No water from well. No power to house. House vacant. Did not perform any sampling.

1115 MWH began sampling activities at 1009 Reder Rd. Will take field duplicate here instead of 1007 Reder Rd. Roll 15 Photo 7 Facing East. Photo of new 1-1 sampling for VOCs at 1029 Reder Rd.

1240 MWH finished sampling at 1029 Reder Rd.

1245 Observed Austgen working on EW power panel.

1320 MWH completed residential well sampling

1330 Left site for day.

T. E. Albert
10/15/01

114

Oct 18, 2001

0815 Arrive Onsite - Sunny 70°F
 0830 Visit Offsite Area to observe
 completed work. Austgen working
 on SVE blower shed electrical

1000 Weekly Const. Mtg
 Todd Lewis #mtg

Travis Klongfuth

Rob Adams

Peter Vest

Tom Timms

Lee Orsz

Kevin Adler EPA (phone)

Larry Campbell BWSF

• Health & Safety

- No incidents recently - No Contractors
 onsite last couple of weeks

• Groundwater Treatment Plant

- Bringing in water from BWSF +
 wells 10, 11, 17, 18, A4. Discharging
 to wetlands @ 50 gpm

• Groundwater Monitoring

- Conducted QTY LT monitoring on
 Sept 25 - sampled 5 wells

- Oct 15 Conducted residential well
 Sampling @ 4 homes, 5th had fire
 Jim Campbell

115

I had no electricity to run Pump
 at 1007 Radar Rd.

- Sept 26 Conducted ORC well Sampling

• PCB Soil Excav

- Final MB Soil Clearance sample results
 received - All Clear

- Midwest Environment to return next
 week to cleanup pond area. Will
 remove plastic Roadway next week.

- Pond currently extends over PCBs area
 So draining into PCBs - Will move
 Eastern end of pond further West.

- PCB Soil removal $\approx 5800 \text{ yd}^3$

Pond soil removal $\approx 6500 \text{ yd}^3$

• Off Site Utilities

- TUPSCO to set meter for blower shed

- The Motor Control Center installed in shed

• BWSF

- Contract. Decoupling is working with
 MWL to determine resolution to EWC problem

- Currently pulling water from all 3 onsite
 trenches - May add another pumping location
 to replace Strawla pond as extraction points

• ISUE

- Thermal oxidizer under const - Arrive in Dec
 Jim Campbell

116

- ISVE Conveyance piping contract to be awarded next week.
- Const to begin in 2-3 weeks
- " " take \approx 3 weeks
- Blower installed in Dec.
- Actually up & running in Jan 2002
- MWE working on Control System software.
- Drum Removal
 - Negotiations w/ Heritage broke down
 - Have reached agreement w/ Onyx
 - Onyx will profile waste & prepare documents
 - Onyx can remove overpack drums w/o additional sampling
 - Onyx prob. start removing drums Oct 29
 - Kevin checked that Onyx disp site is OK
 - Probably send to incinerator in IL or to Landfill in Pt. Arthur, TX
 - May use MWE to dump roll of bags onto pad & cut into smaller pieces
 - Onyx to remove carcasses \approx 2-3 weeks
 - Next Mtg - 2 weeks out

Nov 1, 2001

1040 Mtg over

Sam Campbell

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Nov Inspected PCB Soil Area & New Pond

- Took photos

• At End of pond looking West

• At Mid of N. Side of pond look West

• Looking NE at treat plant & sludge

• " " Saw a fox in sand at end of pond

11:45 Visited OFR Site Area

took various photos

of completed internal swiler

+ 1 pond

12:10 Left Site

Sam Campbell

(118)

10/30/01

J. E. Ellwood

- 0715 Arrive on-site. Partly Cloudy, Wind from east, approx 50°F. ^{on OFCA} MWH ~~not on site~~ all CDS on OFCA, mobilized to site
- 0730 Walked to OFCA, Alex Ellwood (MWH) on OFCA, CDS moving trench box pieces to OFCA. Mr. Ellwood reported that CDS removed top soil and clay, directed not to do more until PID present.
- 0745 Personnel Present
 Alex Ellwood MWH
 Dennis Korrav CDS
 Barry McHard CDS
 Leigh Abbrecht BVSPC
- 0800 Returned to OFCA. Revised MWH and CDS contract for excavation work. Alex Ellwood stated that CDS removed additional clay cover and topsoil so that the contaminated materials could be stockpiled on OFCA for replacement.
- 0815 Roll 15 Photo 14 Facing South of EN 20C casing and removed clay material stockpiled south of location of trench work to prevent stormwater from Swale 2x. Observed MWH performing air monitoring with PID.

J. E. Ellwood

(119)

10/30/01

J. E. Ellwood

- 0830 Walked OFCA, Observed silt fencing added on Western portion of Area 3, immediately east of Swale 1.
- 0835 Roll 15 Photo 15 Facing Southwest of silt fencing west of Area 3, east of Swale 1.
- 0845 Roll 15 Photo 16 Facing South Photo of root zone material breaching silt fence and eroding into Swale 3. No erosion matting present.
- Roll 15 Photo 17 Closeup of erosion, facing East
- Roll 15 Photo 18 Facing south of erosion and breached material from stockpile.
- 0915 Roll 15 Photo 19 Facing south of CDS constructing trench box.
- 0925 Roll 15 Photo 20 Facing Southeast of CDS connecting to trench box.
- 1050 CDS completed constructing trench box.
- 1130 Left site for lunch.
- 1200 Return to site.
- 1300 Observed CDS begin excavating material and monitoring with PID. CDS placing material on top ~~of~~ ^{to} remove clay.
- 1310 Roll Photo 21 Facing northeast of CDS excavating near EN 20C and performing air monitoring with PID.

J. E. Ellwood

(120)

10/30/01 *High Elevation*

1340 CDS placed trench box in excavation on level A encountered groundwater and began hooking up piping for groundwater to GWT. CDS stated that they got a PID spike at 30 ppm and it immediately read 0 ppm afterwards. Emler MWH stated that stockpiled material will be covered with plastic sheeting at end of day. MWH to perform air monitoring with PID.

1345 Roll 15 Photo 22 Facing northeast
Photo of trench box in place and groundwater.

1350 Alex Ellwood stated that CDS will be in level C PPE when inside the excavation. He also stated that IDEM RCRA inspectors visited the site regarding the drum wastes. Inspectors to return Wednesday to complete inspection on ACS facility. MWH under ACS Generator ID.

1530 Left Site for Day

High Elevation
10/30/01

(121)

11/2/01 *High Elevation*

0715 Arrive on site, Partly cloudy, Wind from Northwest
Approximately 58°F.

Personnel Present Onsite:

* Todd Lewis MWH

Alex Ellwood MWH

Gryczewski ODS

B. Motford CDS

Dennis Karkav CDS

* Leigh Albrecht BUSPC

0725 Walked to wetland area. Area has been regraded, swale is full of water, regraded near GWT.

0730 Roll 15 Photo 23 Facing West of completed wetland pond area.

0740 Observed OFCA. Material from excavation at EWRDC stockpiled and tarped. Observed caution tape around perimeter of stockpiled soil. Well point system in place. Alex Ellwood reported that CDS needs different pump for well point system. to be delivered today. Excavation activities ^{still} on hold for pump. Alex Ellwood is requiring respirators around area of excavation during excavation activities. PID readings between 20-60 ppm around edge of excavation during excavation at material.

High Elevation

(122)

11/2/01 *Jeff Sullivan*

0745 Roll 15 Photo 24 Facing northeast Photo of excavation and wellpoint system. Material below cap that was excavated is stockpiled on south. Decon area established, gravel delivered for bottom of excavation.

0900 Kickoff Meeting for Drum Waste Disposal
Attendees: * on previous list plus: (ONYX)
Douglas Drala OES Bill Dwyer OES
Travis Klingforth MWH Dan Preby OES
Peter Vagt MWH Jason Coburn OES
Ken Field MEI John Flaminio OES
Pat O'Shea OES.

Schedule & Logistics

- Move overpacks out on Monday 11/5/01
- Shearer on site 11/8/01 begin shearing the rolloff drum debris. Dwyer to unload some rolloffs on pad.
- Begin loading enddrum debris Friday 11/9/01

H+S

- MEI determine exclusion zone, OES outside of exclusion zone. Level B PPE inside exclusion zone. MEI to monitor A/PID + CEL
- MWH - monitor with PID
- Days OES will have ft respirators, SCBA, PID

Jeff Sullivan

(123)

11/2/01

*Jeff Sullivan*Disposal Procedures

- OES - labels, manifests, DOT and will move rolloffs
- Staging and decon by MEI on pad, water to go to GWTP
- OES personnel present throughout activities. Require loads with flash point > 140°F, will monitor

1010 Mtg. Concluded.

1030 Walked drum storage area with MWH and OES

1050 Followed MWH inspect line from excavation to GWTP. Observed OES working at EW20C.

1120 Observed OES labeling the drums on pad.

1125 Roll 15 Photo 25 Facing west of OES characterizing drums and labeling

1140 Left site for Day.

Jeff Sullivan
11/2/01



Site: American Chemical Services, Inc.

Proj. #: 46526

Roll: 15 Photo #1

Date: 09-27-01 Time: 08:35

Photographer: Leigh Albrecht

Description: Photo facing west looking down at
GWTP discharge structure 1 draining
towards swale into wetland pond.



Site: American Chemical Services, Inc.

Proj. #: 46526

Roll: 15 Photo #2

Date: 09-27-01 Time: 08:40

Photographer: Leigh Albrecht

Description: Photo facing southwest looking down at
the concrete with rebar placed on the
geotextile in the swale from drainage
structure 1 to the wetland pond.



Site: American Chemical Services, Inc.

Proj. #: 46526

Roll: 15 Photo #3

Date: 10-02-01 Time: 08:55

Photographer: Leigh Albrecht

Description: Photo facing west looking down at the collar around repaired ISVE well SVE-36.

Site: American Chemical Services

Proj. #: 46526

Roll: 15 Photo #4

Date: 10-10-01 Time: 09:10

Photographer: Leigh Albrecht

Description: Photo facing southeast showing the northern portion of the swale constructed from the ACS facility to the northern wetland area.



Site: American Chemical Services, Inc.

Proj. #: 46526

Roll: 15 Photo #5

Date: 10-10-01 Time: 09:20

Photographer: Leigh Albrecht

Description: Photo facing west showing the swale that flows from the ACS stormwater discharge point around the wetland pond area.



Site: American Chemical Services

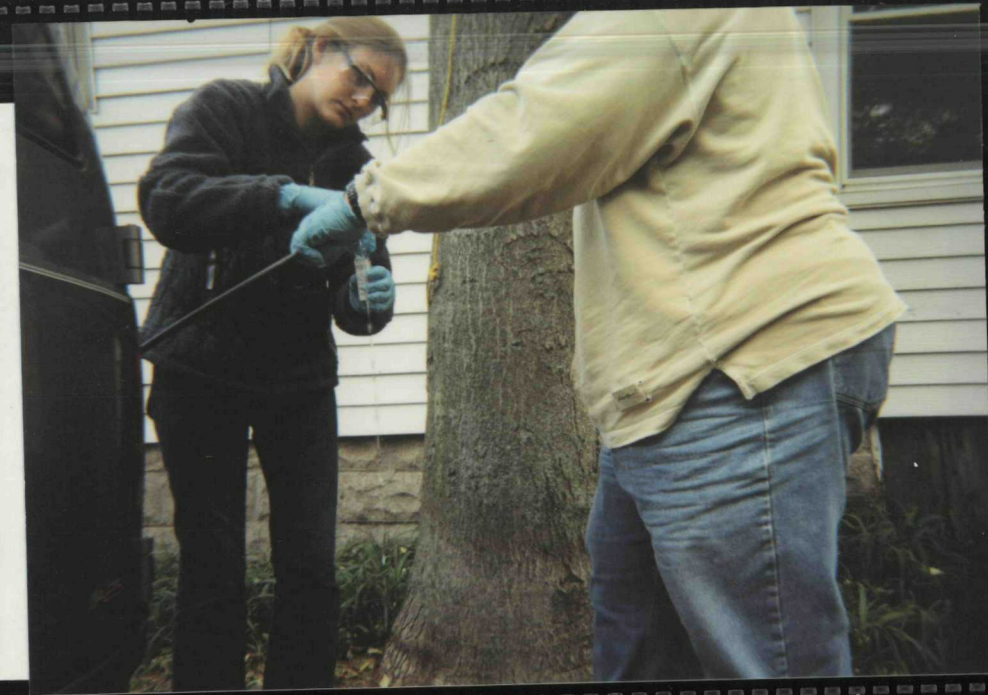
Proj. #: 46526

Roll: 15 Photo #6

Date: 10-10-01 Time: 09:30

Photographer: Leigh Albrecht

Description: Photo facing east showing the rolloff with the black liner that contains ISVE well drill cuttings that was relocated to the ONCA.



Site: American Chemical Services, Inc.

Proj. #: 46526

Roll: 15 Photo #7

Date: 10-15-01 Time: 12:20

Photographer: Leigh Albrecht

Description: Photo facing east of MWH personnel sampling for VOCs at 1029 Reder Rd. during the annual residential well sampling event.



Site: American Chemical Services, Inc.

Proj. #: 46526

Roll: 15 Photo #8

Date: 10-18-01 Time: 11:00

Photographer: Larry Campbell

Description: Photo facing west of pond excavation in the wetland area. Note black bat house on pole.



Site: American Chemical Services, Inc.

Proj. #: 46526

Roll: 15 Photo #9

Date: 10-18-01 Time: 11:10

Photographer: Larry Campbell

Description: Photo from the middle of the north side of the pond facing west. Note salt block placed by MWH for deer.



Site: American Chemical Services, Inc.

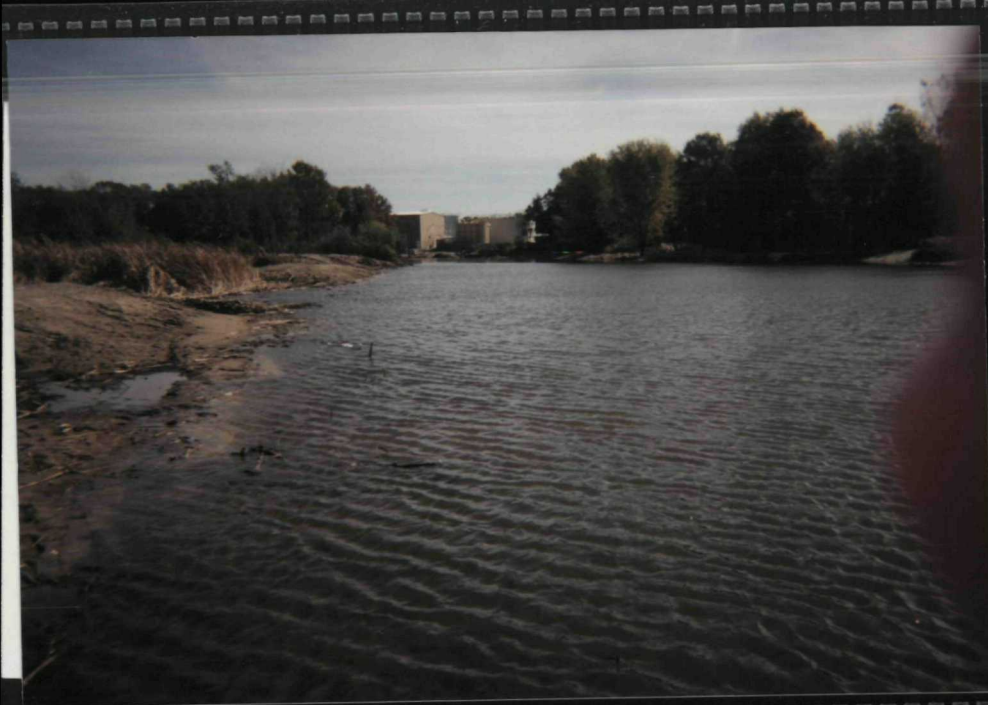
Proj. #: 46526

Roll: 14 Photo #10

Date: 10-18-01 Time: 11:15

Photographer: Larry Campbell

Description: Photo facing northeast showing the GWTP effluent from drainage structure 1, located immediately north of the pond.



Site: American Chemical Services, Inc.

Proj. #: 46526

Roll: 15 Photo #11

Date: 10-18-01 Time: 11:30

Photographer: Larry Campbell

Description: Photo from the western boundary of the pond facing east.



Site: American Chemical Services, Inc.

Proj. #: 46526

Roll: 15 Photo #12

Date: 10-18-01 Time: 11:45

Photographer: Larry Campbell

Description: Photo facing north of erosion matting placed on swale 2. Note crushed stone access roadway to OFCA blower shed.



Site: American Chemical Services, Inc.

Proj. #: 46526

Roll: 15 Photo #13

Date: 10-18-01 Time: 11:55

Photographer: Larry Campbell

Description: Photo facing northwest of swale 1 and the erosion matting placed on the northern portion of Area 3. Sedimentation basin in background.

Site: American Chemical Services, Inc.

Proj. #: 46526

Roll: 15 Photo #14

Date: 10-30-01 Time: 08:15

Photographer: Leigh Albrecht

Description: Photo facing south of EW-20C and removed clay cover material stockpiled south of the excavation to prevent stormwater run-off into the excavation.



Site: American Chemical Services, Inc.

Proj. #: 46526

Roll: 15 Photo #15

Date: 10-30-01 Time: 08:35

Photographer: Leigh Albrecht

Description: Photo facing south on west side of OFCA, showing the silt fencing installed west of Area 3, bordering swale 1.

Site: American Chemical Services, Inc.

Proj. #: 46526

Roll: 15 Photo #16

Date: 10-30-01 Time: 08:45

Photographer: Leigh Albrecht

Description: Photo facing south on east side of OFCA, showing the stockpiled root zone material overtopping the silt fencing and the erosion on the OFCA cover.



Site: American Chemical Services, Inc.

Proj. #: 46526

Roll: 15 Photo #17

Date: 10-30-01 Time: 08:45

Photographer: Leigh Albrecht

Description: Photo facing east on east side of OFCA showing the erosion in the OFCA clay cover into swale 3 on the northeastern portion of the OFCA.

Site: American Chemical Services, Inc.

Proj. #: 46526

Roll: 15 Photo #18

Date: 10-30-01 Time: 08:45

Photographer: Leigh Albrecht

Description: Photo facing south on east side of OFCA showing the erosion in the cover on the northeastern portion of the OFCA cover.



Site: American Chemical Services, Inc.
 Proj. #: 46526
 Roll: 15 Photo #19
 Date: 10-30-01 Time: 09:15
 Photographer: Leigh Albrecht
 Description: Photo facing south showing CDS
 constructing the trench box.

Site: American Chemical Services, Inc.
 Proj. #: 46526
 Roll: 15 Photo #20
 Date: 10-30-01 Time: 09:25
 Photographer: Leigh Albrecht
 Description: Photo facing southeast showing CDS
 constructing the trench box.



Site: American Chemical Services, Inc.

Proj. #: 46526

Roll: 15 Photo #21

Date: 10-30-01 Time: 13:10

Photographer: Leigh Albrecht

Description: Photo facing northeast showing CDS excavating near EW-20C and performing air monitoring with a PID.

Site: American Chemical Services, Inc.

Proj. #: 46526

Roll: 15 Photo #22

Date: 10-30-01 Time: 13:45

Photographer: Leigh Albrecht

Description: Photo facing northeast of trench box in excavation and the top of the groundwater table.



Site: American Chemical Services, Inc.

Proj. #: 46526

Roll: 15 Photo #23

Date: 11-02-01 Time: 07:30

Photographer: Leigh Albrecht

Description: Photo facing west of completed wetland pond area. Note that grading on the eastern portion of the pond has been completed.

Site: American Chemical Services, Inc.

Proj. #: 46526

Roll: 15 Photo #24

Date: 11-02-01 Time: 07:45

Photographer: Leigh Albrecht

Description: Photo facing northeast showing the excavation and well point system at EW-20C.



Site: American Chemical Services, Inc.

Proj. # 46526

Roll: 15 Photo #25

Date: 11-2-01 Time: 11:25

Photographer: Leigh Albrecht

Description: Photo facing west of Onyx Environmental
Services characterizing overpack drums
and labeling.